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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BARBARA L. BONKOFSKY,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

Case No. 2:23-cv-02690-AC

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR
EXTENSION OF TIME FOR
PLAINTIFF TO FILE
MOTION FOR SUMMARY
JUDGMENT**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the deadline for Plaintiff to file her Motion for Summary Judgment shall be extended from February 15, 2024 to **February 29, 2024**. In support of this request, Plaintiff's counsel states as follows:

1. This is plaintiff's first request for an extension in this matter.
2. Plaintiff's Motion for Summary Judgment is currently due February 15, 2024.
3. Good cause exists for this request, as Plaintiff's counsel recently returned from long-planned travel which interfered with his ability to timely complete Plaintiff's Motion for Summary Judgment.

6. Plaintiff's counsel makes this request in good faith with no intention of unduly delaying these proceedings.

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